

December 20, 2016

Ms. Barbara Alfano
US Environmental Protection Agency Region 4
Atlanta Federal Center
61 Forsyth Street, S.W. 10th Floor
Atlanta, GA 30303-8960

RE: FY 2017 EPA Brownfields Assessment Grant Application

Dear Ms. Alfano:

On behalf of the town of Stanton, Tennessee, enclosed is a proposal for United States Environmental Protection Agency funding for brownfields assessment activities.

The town of Stanton was established in 1856 with the coming of the Memphis & Ohio Railroad, and our economy has long been based on agriculture. Our town is known for our "can-do attitude," and we have a great deal of pride in our community. We are especially proud of Stanton Cannery. The Cannery originally opened to encourage low income families to raise gardens and can their excess produce for later consumption. It was an effort to stretch the benefits of food stamps. We recognize our connection to the land, and we also recognize the importance of a clean, safe environment which is one of the major reasons we are pursuing an EPA Brownfield Assessment Grant. The environmental legacies of an old gin, an area used for disposal of contaminated cotton, a defunct gas station, and concerns over past uses along the rail line are just a few of the brownfield challenges that we face. We have a vision for building a Central Business District which will allow us to nurture a sense of place and connectedness that is only provided in small town America. This EPA Brownfield Assessment Grant is a critical component to that vision.

- a. Applicant Identification:** Town of Stanton, Tennessee (DUNS# 099171043)
8 Main Street
Stanton, TN 38069
- b. Funding Request:**
- i. **Grant Type:** Assessment
 - ii. **Assessment Grant Type:** Community-wide
 - iii. **Federal Funds Requested:** \$300,000
 - iv. **Contamination:** Hazardous Substances (\$150,000) and Petroleum (\$150,000)

- c. **Location:** The assessment grant proposal targets the City of Stanton, Tennessee.
- d. **Property Information for Site Specific Proposal:** The City of Stanton is applying for a Community-Wide Assessment Grant; therefore, this section is not applicable.
- e. **Contacts:**
- i. **Project Director:** Mayor Allan Sterbinsky, will serve as the Project Director for this proposal. Mayor Sterbinsky's contact information is as follows: phone (731) 548-2565, Allan.Steribinski@gmail.com, 8 Main Street, Stanton, TN 38069
 - ii. **Chief Executive/Highest Ranking Official:** Same
- f. **Population:**¹ City of Stanton, Tennessee: 428
- g. **Regional Priorities Form/Other Factors Checklist:** Attached
- h. **Letter from the State or Tribal Environmental Authority:** Attached

Please do not hesitate to contact me at (731) 621-8164 or Allan.Steribinsky@gmail.com if you have any questions or require any additional information. Thank you for your favorable consideration of this proposal.

Sincerely,

All- Sterbinsky
Allan Sterbinsky, Mayor
City of Stanton, Tennessee

¹ US Census Bureau, American Community Survey. 2010-14

1. COMMUNITY NEED

1.a. Target Area and Brownfields

1.a.i. Community and Target Area Descriptions: Stanton, Tennessee, is a small town still standing despite one economic blow after another. Stanton is located in the middle of the land of the Delta Blues in Haywood County Tennessee, home of Tina Turner. Stanton was incorporated in 1853 and has over a century and a half of rich history. Stanton came to be when the Memphis and Ohio Railroads built the Stanton Depot. Situated in the middle of the rich fertile lands of the Mississippi Delta, Stanton grew into an agricultural center and still remains mostly a farming community. The economy continued to grow through the years as Stanton gained a large lumber mill and yard and a large cotton mill at the center of town. Stanton added a Dairy Queen, gas stations, grocery stores, and department stores that some say rivaled the like of Macy's and Nordstrom. Stanton was vibrant and booming. Some residents remember barely being able to cross Highway 72 for all of the constant traffic. Stanton was on a main artery flowing from Nashville to Memphis by train and by rail.

The dagger to the heart of Stanton came with the opening of the Interstate I-40. Although the interstate was constructed within about 5 miles from Stanton, it just was not close enough to catch any of the benefits of the traffic as it once did. Slowly, the economy in Stanton began to turn for the worst. As the traffic went, so did the Dairy Queen, the grocery stores, gas stations, and department stores. The next devastating economic setback came when the lumber mill closed in the 1960s and then the cotton mill also began to slow down even though Haywood County is still the largest producer of cotton in the state.

As a result of the severe economic downturn in Stanton, businesses began to close all over the town, leaving large amounts of vacant buildings and homes, especially on Main Street. For years many of the buildings downtown began to deteriorate to the extent that Stanton had to begin demolishing these buildings. If you drive through downtown Stanton today, you will actually see more building foundations than you will actual buildings. However, Stanton has real hope of making a strong comeback due to some changes in the economic winds. The State of Tennessee has created a "Mega Site" from 40 million dollars' worth of land in Haywood County only a few miles away from Stanton. It is the intention of the State of Tennessee to attract a huge industry to the site such as automobile factory like Nissan or Honda. A new factory at this site would create hundreds of jobs and would certainly create spinoff businesses and a general boom for Stanton. However, Stanton is not poised for this economic boom without addressing its many brownfield sites. Therefore the target area for this assessment grant will be the entire city limits, which is not that large. By addressing these properties now, Stanton will be able to attract more business here, as opposed to those businesses moving a little further away to Brownsville or Jackson.

1.a.ii. Demographic Information and Indicators of Need: The Mississippi Delta has been a statistically poor region that is economically, and culturally different from most of the rest of the state. Stanton consistently has poorer educational attainment, employment, and median household income than Tennessee as a whole. The median home value for Stanton is less than half of the national average and the median household income for Stanton residents (\$16,917) is more than three times less than the State (\$53,889). Those living under the poverty level in Stanton (42.2%) are in stark contrast to the average of those living in the state (17.6%) and the rest of the country (15.5%). Furthermore, unemployment rates in Stanton (13.9%) have risen to over double that of the national and state averages. These discouraging economic statistics in Stanton could be partly attributed to the high number of vacant businesses and housing in our community.

Those living on government assistance for food in Stanton are almost half of the town's population (48.1%), which is 3.64 times higher than the national average of 13.2%. More than 22% of the population has no vehicle for transportation. Therefore, many of the residents are literally stuck with no job and no way to get out of town to obtain one. Minorities comprise 80.8% of the population. In addition, the number of disabled persons (18.4%) is more than 48%

higher than that of the national average (12.4%). It could not be any clearer that **Stanton needs the economic help** that the EPA Community-wide Assessment Grant could bring.

General Demographics				
	US	Tennessee	Haywood County	Stanton
Population	316,515,021	6,499,615	18,248	396
Minority Population	37.7%	25.3%	54.8%	80.8%
Unemployment**	5.2%	5.1%	5.8%	13.9%
Poverty Rate	15.5%	17.6%	22.8%	42.2%
Female Householder, No Husband Present	13.0%	13.4%	15.6%	38.9%
Vacant Housing Units	12.3%	12.3%	16.3%	27.6%
Median Housing Value	\$178,600	\$142,100	\$99,100	\$75,200
No Vehicles Available	9.1%	6.4%	11.8%	22.1%
Less Than A High School Diploma	7.6%	8.9%	14.2%	15.2%

Source: US Census Bureau, American Community Survey (ACS), 2011-2015; **Bold Type** indicates Significant disparity

1.a.iii. Brownfields and Their Impacts

Stanton is not a large place and therefore, the Town is aware of all 15 brownfield sites. There are almost as many brownfield properties as there are viable businesses. Most of the town's brownfield sites were built prior to 1978, making them potentially hazardous due to the presence of asbestos and lead. Approximately half of the brownfields sites in the downtown area are buildings that were built in the 1930s. To make matters worse, 27.6% of the houses in Stanton today are vacant. However, it is the largest brownfield at the center of town that creates the most concern for the Town. This site is described immediately below with four other sites that Stanton has considered high priority. More detailed information regarding the criteria utilized for selecting priority sites can be found in **section 2.a.ii.b.**

Site 1: Former Cotton Salvage Mill - This site is approximately 12 acres in size and includes one large mill structure and 5 sizeable warehouses along with some smaller structures and an office building. This former mill was used to clean and salvage contaminated cotton. It is unknown all of the different types of contaminants that were cleaned from the cotton but it is common knowledge that most of the cotton that was brought into the mill was impacted by petroleum. The cotton was also likely cleaned with solvents. It was reported that not all of the cotton was always able to be salvaged and it was disposed of in a large field on the property. There are old tires and other trash that are mixed in with dozens of piles of decaying cotton. Benzene is a common contaminant found in petroleum and exposure has known health effects including: cancer, low birth weight, preterm birth, birth defects, and impaired cognitive development. Arsenic is also commonly used to kill insects at cotton mills. There is also hydraulic machinery that uses various types of petroleum oils that could leak into the ground.

Site 2: Former Dry Cleaner- This former dry cleaner is located on Main Street, two doors away from Town Hall and is next to a former gas station. The site is only about one-tenth of an acre and is in an older dilapidated building. The contaminants suspected to be at the site include PCE, TCE, and carbon tetrachloride. Tetrachloroethylene (PCE) and perchlorethylene (TCE) are commonly found in dry cleaning and industrial solvents. Carbon tetrachloride is a byproduct of the breakdown of PCE and is used as a solvent in industrial applications. Known health effects from these contaminants include: respiratory problems, liver/kidney damage, nerve damage skin irritation, and headaches.

Site 3: Former Gasoline Station, Covington St. & Hwy 70 – The site is approximately 0.12 acres in size. Only the foundation of the building remains. It is not known whether the tanks are

still present at the site. The contaminants suspected at this site are volatile organic compounds (VOCs including benzene), polynuclear aromatic compounds (PAHs), and Lead.

Site 4: Former Gas Station, Main Street - 1.5 acres- This property is located at the corner of Main Street and West Main Street and has been abandoned for several years. In addition to the potential petroleum issues that might be present, the building may contain asbestos due to the age of the structure. Asbestos is known to lead to health issues such as asbestosis or mesothelioma.

Site 5: Vacant property, Main Street - 0.5 acres- The property is located at the center of town on Main Street and is approximately 0.71 acres in size. It is not known what used to be at this property but it has had some redevelopment interests. The site is suspected to be potentially contaminated with arsenic due to its proximity along the railroad tracks. Arsenic is known to cause cancer and affect the kidneys and liver.

All of these sites described above are all located within 100 feet of residential property. Some of these sites are directly adjacent to residential properties.

1.b. Welfare, Environmental, and Public Health Impacts

1.b.i. Welfare Impacts: Stanton residents have a substantial lack of access to community services. According to *datawarehouse.hrsa.gov*, Stanton is located in a Medically Underserved Area in both dental and primary care medical. The Stanton ratio is only 43.9 primary care provider for every 100,000 people. Comparatively for the State of Tennessee, this rate is 72.6. Illustrating this issue further, Stanton's rate of "Preventable Hospital Events" per 100,000 is **86.98** while Tennessee's rate is 73.2 and the National rate is 59.2, which are both much lower.

Another issue is the distance that so many of the Stanton residents have to travel to work or for goods and services. Stanton residents are subjected to lack of food access. For grocery stores, the establishment rate for Stanton is 15.97/100,000, while the national rate is 21.1/100,000.¹ Furthermore, According to the USDA- Food Access Research Atlas, 77% of the Town is designated as having "Low Food Access." In addition, the County is ranked 94th out of 95 Counties for "Food Environment Index".² This indicates a lack of access to healthy food, and is a negative environmental influence on dietary behavior. Correspondingly, there is a lack of recreation and fitness facilities in Stanton with a rate of 5.32/100,000 versus a national rate of 10.1/100,000, which also contributes to obesity and lack of physical fitness³. Haywood County is ranked dead last of all 95 counties for "Adult Obesity" with 41.3% of adults being considered obese.⁴

On a positive note, Stanton has a relatively low crime rate. The property crime rate is 25.76 compared to the state rate of 29.36⁵. One possibility is that the poverty is so prevalent in Stanton is that there is not much for anyone to take. However, the economic conditions in the area are adding to the economic burden of the town. Stanton has had to spend over \$40,000 demolishing unsafe abandoned buildings.

1.b.ii. Cumulative Environmental Impacts:

There are also a set of railroad lines that run through the center of Stanton and also a spur to the former Cotton Salvage Mill. Herbicides containing arsenic that were once used for spraying the tracks is also a potential exposure issue to the residents. Lead exposure from lead-based paint is another potential cumulative exposure due to the number of low-income families living in aging houses. Scorecard ranks Stanton in the 90th percentile of having housing units with children living in poverty at a high risk of lead. Lead is a recognized cause of cancer and can cause serious health problems for pregnant women and developing children. Lead is also suspected of damaging the nervous, reproductive, endocrine, respiratory, and immune systems in addition to causing low birth weight. Decades of pesticide use on

¹ US Census Bureau, County Business Patterns

² http://www.tn.gov/assets/entities/health/attachments/CountyReports_HAYWOOD_2016.pdf

³ US Census Bureau, County Business Patterns

⁴ http://www.tn.gov/assets/entities/health/attachments/CountyReports_HAYWOOD_2016.pdf

⁵ Neighborhood Scout

surrounding farmland could be another cumulative environmental impact. Also the water quality may also be a concern. Stanton's water well that supplies the town's water is located less than 400 feet south of the open field where contaminated cotton has been dumped for years.

1.b.iii. Cumulative Public Health Impacts:

Although Stanton does not have town-level health statistics available, we believe the County statistics accurately reflect the state of health for Stanton. Benzene's known health effects also include low birth weight. According to the Tennessee Department of Public Health in their 2014 report, 12.7% of all live births were considered "low birth weight, opposed to the state percentage of 8.9%. Furthermore, Haywood County is ranked 94th out of the 95 Tennessee Counties for their percentage of "Low Birthweight" births. The County is also ranked 94th for "Poor to Fair Health", with 29.8% of the population considered in poor or fair health.⁶ Furthermore, according to countyhealthrankings.org, Haywood County is ranked 90th out of 95 counties for "Health Outcomes Overall Rank".

Sensitive populations have been identified as more vulnerable to environmental hazards. Children's capacity to absorb 4 times more contamination than adults targets them as a high risk group for toxic exposures. Additionally, individuals with altered immunity (such as cancer patients) and those with cognitive and physical disabilities may also be more at risk from specific toxic exposures.⁷ Stanton's population of children, elderly, and the disabled are higher than the county, and much higher than the state and nation, based on the latest US Census Statistics.

	US	Tennessee	County	Stanton
Minority Population	37.7%	25.3%	54.8%	80.8%
Children under 5 years	6.3%	6.2%	5.7%	10.6%
65 and over	14.1%	14.6%	15.7%	8.3%
Population With A Disability	12.4%	15.3%	17.8%	18.4%
Female Householder, No Husband Present	13.0%	13.4%	15.6%	38.9%
Female Householder, No Husband Present With Children Under 18 Years	7.1%	7.2%	7.0%	21.4%

Source: US Census Bureau, American Community Survey (ACS), 2011-2015;

Bold Type indicates significant disparity

1.c. Financial Need

1.c.i. Economic Conditions: Population among small towns like Stanton has dropped dramatically as people moved to the more populated areas, such as Brownsville, Memphis and Jackson. Since the year 2000, Stanton has experienced a 55.3% loss in population, based on the US Census. This has translated to falling revenues. In fact, Stanton's revenues dropped over 17% from 2014 to 2015 (\$687,910 to \$587,454). Stanton has had to stay above water through supplementary revenues from other grants. However, this assessment grant could be the most important source.

Stanton lost 12 more jobs when the cotton salvage mill closed in 2016. The next largest employer is a local concrete plant that employs 12 people but has recently remained closed for the majority of the time. This loss of jobs further damages the community and accounts for about 20% of the current workforce in Stanton. The decline of the number of jobs has put this struggling rural town on life support. Due to the current state of the economy, dwindling population, and high commercial vacancy rates, Stanton simply does not have the resources or expertise to assess these properties without financial assistance. The table below illustrates how distressed the economic conditions are in Stanton. The unemployment rate is more than 2.5 times the national average. The poverty level is almost three times the national average. Even

⁶ http://www.tn.gov/assets/entities/health/attachments/CountyReports_HAYWOOD_2016.pdf

⁷ <http://envirn.org/pg/pages/view/1345/risk-and-vulnerability>

worse, the number of those living in poverty that have children under 18 years of age is 84.3%. The median household income is 3.2 times less than the national average.

Economic Indicators				
	US	Tennessee	Haywood County	Stanton
Unemployment**	5.2%	5.1%	5.8%	13.9%
Per Capita Income	\$28,930	\$25,227	\$19,027	\$12,274
Median Household Income	\$53,889	\$45,219	\$34,182	\$16,917
With Food Stamps/SNAP Benefits Past 12 Months	13.2%	17.1%	28.8%	48.1%
Median Family Income	\$66,011	\$56,110	\$44,456	No data
Poverty Level	15.5%	17.6%	22.8%	42.2%
Poverty Level With Related Children Under 18	21.4%	25.3%	32.3%	84.3%

Source: US Census Bureau, American Community Survey (ACS), 2011-2015;

Bold Type indicates Significant disparity

1.c.ii. Economic Effects of Brownfields:

Brownfields continue to have an impact on the community and are contributing to lost opportunities. A mop factory that would have brought dozens of jobs to Stanton was considering for Stanton but ultimately determined that there were too many issues to deal with in the town. The Town embarked on a mission to begin demolishing structures that were deteriorating and sitting vacant, but it has put an additional strain on Stanton's budget. The vacant businesses have resulted in a reduced tax base. As stated in the previous section, Stanton's revenues decreased last year by more than 17%. Property values are depressed as well with housing values in Stanton averaging more than \$100,000 less than the average household value in the US (US Census Bureau, American Community Survey (ACS), 2011-2015.) A greater financial burden is also placed on the town to demolish deteriorating structures in the town due to blight and safety concerns. In the past 10 years, Stanton has had to demolish at least 10 buildings along Main Street for this reason.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

2.a. Project Description, Timing, and Implementation

2.a.i. Project Description and Alignment with Revitalization Plans: This is a community-wide assessment project and will be focusing on sites throughout the Town, most of which fall along the Town's two Main corridors: Main Street and Highway 70. The grant-funded tasks will include the completion of 15 Phase I Environmental Site Assessments (ESAs), and estimated 5 Phase II ESAs, and clean-up planning for an estimated four sites. This project will also focus on community outreach efforts as a means to involve all of our community in the revitalization of Stanton.

Stanton has not had the resources to develop a large Comprehensive Plan or a Downtown Master Plan. However, this does not mean in the least that the town has no plan. The Mayor, Dr. Allan Sterbinsky, identifies potential grants that meet the strategic goals of the town, and then locates the resources needed to design, write, administer, and manage the grant. This process includes a combination of people from a wide variety of organizations who have the requisite expertise. For example, the Mayor may assemble a team of experts from schools; economic development staff from the region or state; the chamber of commerce; or the regional development district. Once the team is assembled, the team determines how the grant requirements can best meet the strategic needs of the town, and identifies the appropriate person, group, or organization to write the grant. Once the grant is written, a grant administrator and a grant manager are selected. Typically, the grant administrator comes from one of the

organizations represented on the team of experts. The grant administrator may be an employee of a private firm (specializing in the specific type of grant), or may be from a governmental organization. The Mayor is hands-on and typically functions as the grant manager. One of the benefits of a small town is the ability of the Mayor to know the people affected by the grant, the landowners, the business owners, and most of the people in the town. This allows the Mayor to communicate with the appropriate people in town and the team of experts. The Mayor knows the deadlines involved in each part of the grant and can manage the contractors, engineers, and business/landowners appropriately. He also knows when to bring additional people into the project as needed (e.g., Town Planner, Attorney, Planning Commission, Board of Aldermen).

The priority sites discussed in **Section 1.a.iii.** have projected redevelopments that will address Stanton's current community needs. For example, the mill at the center of town needs to be redeveloped into another large industry that would bring in more jobs and tax revenue while being more environment-friendly. The vacant property on Main Street would be a great location for a major drug store or grocery store chain. The Town would like to purchase the former gas Station property on Main Street and redevelop it for additional office space. The remaining sites would best serve to fill the needs of the community, which include the need for more affordable housing and more businesses providing Stanton residents with employment opportunities in the community in which they reside.

2.a.ii. Timing and Implementation: No later than 90 days after grant award, the Town will seek a qualified environmental firm for the purposes of managing and performing this grant and supporting the Town's Brownfield Program. The solicitation will be issued pursuant to the Federal procurement standards, outlined in CFR 6 §200.317 - CFR §200.326, that are applicable to hiring of consulting firms or individuals to assist communities with grants awarded by the EPA. All respondents must be prepared to meet all Federal requirements for work funded by the Town's EPA Brownfields Assessment Cooperative Agreement. Respondents must include a statement affirming their commitment to comply with the EPA's requirements. Environmental consultants must demonstrate that they have expertise and exemplary performance providing programmatic support, performing site assessments, preparing and executing Quality Assurance Project Plans (QAPP), preparing site inventories, assisting with site prioritization, cleanup and reuse planning, and community engagement and involvement. Consultants must identify project experience similar to the ones envisioned for the work and services identified in the solicitation. Upon review of the proposals, a selection committee will designate and shortlist the most qualified respondents. The shortlisted respondents will be invited to appear for an interview by the selection committee with oral presentation and evaluation. After deliberation, the selection committee will rank the shortlisted respondents. The Town will begin contract negotiations with the highest ranked team or teams. Once the professional services agreement is signed by the selected contractor, the project will begin.

The City has been preparing for the award of this grant and understands timing is critical since it must be completed within a three year period. Therefore, Stanton has established the following schedule to be adhered to in order to successfully complete all of the tasks:

- **After award and prior to grant start date** – Prepare and submit Work Plan to EPA, Post RFQ and complete selection of consultant, and form the Brownfields Advisory Committee (BAC).
- **0 to 3 months** – Prepare and submit QAPP, hold Kick-off meeting, attend National Brownfields Conference, conduct Phase I on priority sites, and prepare 1st quarterly report and update ACRES database.
- **3 to 12 months** – complete all Phase I ESAs, submit Site-specific QAPPs for Phase II ESAs, and continue ACRES database updates, quarterly reporting, BAC/community outreach meetings.
- **12 to 24 months** – Begin Phase II ESAs, determine which sites need additional delineation, and continue ACRES updates, quarterly reporting, BAC/community outreach meetings.
- **24 to 36 months** – Perform additional assessments to delineate priority sites, perform ABCAs and continue ACRES database updates, quarterly reporting, BAC/community outreach meetings. Finalize ACRES reporting and final closeout report to EPA.

The Town of Stanton's Grant Administrator will be responsible for ensuring the project schedule is maintained, preparing quarterly reports and the final closeout report, and informing and soliciting input from the public. The selected consultant will assist with community outreach, perform ACRES database reporting, conduct all ESAs, prepare ABCAs, perform cleanup planning, and submit all required technical documents to the EPA.

(a) **Contractor Procurement:** Within 30 days of award of the grant, Stanton will advertise a Request for Qualifications (RFQ) from qualified environmental consulting firms to provide their professional services for programmatic support and environmental assessments. After the RFP submittals are evaluated, recommendations will be made by the review board to the selection board for award of contract. RFQ submittals evaluation criteria based on the firm's background, an organizational chart, experience with similar projects and contracts, project approach, relevant project examples within the last 10 years, minority/woman-owned business enterprise status or use on past projects, proof of insurance, and compliance with the Town's standard service agreement. The total time needed to select a contractor will be 2 months.

(b) **Site Prioritization:** Stanton has already completed an inventory of sites within the target area. A few sites have already been determined to be of high priority based upon public and city staff concerns. Additional sites will be prioritized with input from the community based on factors, such as: potential threat to human health and/or the environment, level of interest in redeveloping the site, potential for job creation, potential cost for assessment and cleanup, and redevelopment potential based on location of the site.

(c) **Obtaining and Securing Site Access:** Being a small town, the Mayor of Stanton already knows almost all of the property owners in the town. The Mayor will meet with the owners of brownfields sites along with a qualified consultant to explain the benefits of this program. The Cotton Salvage Yard is in foreclosure and the Mayor has already made strides in gaining access for this site. More reluctant property owners will be personally invited to community outreach meetings where they will also receive more educational information that will help them make a more informed decision. Based on conversations that have already taken place, Stanton, does not anticipate any issues in gaining site access.

2.b. Task Descriptions and Budget Table

2.b.i. Task Descriptions

Task 1, Project Management Costs: Costs associated with this task includes funding for the management and execution of the grant, grant deliverables of EPA quarterly reports, updates to the EPA ACRES database, and other support necessary to maintain compliance with EPA cooperative agreement terms and conditions. The Town of Stanton will designate a Brownfields Coordinator to oversee grant activities during the three year grant period. The Town has estimated approximately \$10,500 for these costs which will be split evenly (\$5,250 each) between the petroleum and hazardous assessment grants. The Town will also seek a qualified environmental consultant to provide administrative and technical support. The Town estimates approximately \$10,500 for a qualified environmental consultant, will also be split evenly (\$5,250 each) between the petroleum and hazardous assessment grants. Project Management costs will include travel and attendance to two national brownfields conferences and the Region 4 EPA New Grantees Meeting. The estimated cost for attendance and travel is for a total of \$8,000, which would allow two personnel to attend the two national conferences (or \$4,000 for each of the petroleum and hazardous assessment grants). The Town estimates a cost of \$2,000 for two personnel to attend the Region 4 EPA New Grantees Meeting (or \$1,000 for each of the petroleum and the hazardous assessment grants). Therefore, the total travel costs to be split between the hazardous and petroleum grants are \$10,000, or \$5,000 each.

Task 2, Community Outreach: The Town along with community stakeholders will work with qualified environmental consultant to prepare a Community Involvement Plan to engage and educate the community. The Brownfields Coordinator will facilitate community outreach activities with the assistance of the qualified environmental consultant. The estimated

contractual cost associated with these activities is \$10,000 split at \$5,000 for each of the petroleum and hazardous assessment grants. The Community Involvement Plan will identify the use of media coverage, meetings, newsletters and social media to provide Brownfields updates and allow for public involvement. The Town estimates the preparation of a Community Involvement Plan and outreach efforts, to cost approximately \$6,000, and includes costs associated with meeting notification, meeting materials, website development, maps, informational handouts, and proposed designs, and will be split at \$3,000 for each of the petroleum and the hazardous assessment grants. Outcomes associated with this task include: number of attendees at community meetings, number of community groups involved, number of community requests received and implemented in the project, number of people visiting the document repository.

Task 3, Phase I ESAs: The Town plans to conduct approximately 15 Phase I ESAs during the grant period using a site selection process based on a risk matrix developed through the community program. The Phase I ESAs for small properties, such as service stations and dry cleaning operations are estimated to average approximately \$3,075 each. The Town plans on performing approximately 10 of these small Phase I ESAs, which will cost approximately \$30,750 to complete. The Town estimates that 5 Phase I ESAs will be completed on larger commercial and light industrial properties at an average cost of \$5,250 per site for a total of approximately \$26,250. Therefore, we are budgeting \$57,000 for the 15 Phase I ESAs. Approximately one-half of the Phase I ESAs will be conducted on petroleum sites and therefore \$28,500 of the total cost is budgeted for petroleum sites and \$28,500 is budgeted for hazardous sites. Phase I ESAs will be performed in accordance with EPA's All Appropriate Inquiries rule per 40 CFR Part 312 and the ASTM E1527-13 standard. The purpose of the Phase I will be identify potential contaminated environmental conditions and if there is a need for a Phase II ESA.

Task 4, Phase II ESAs: Stanton is planning to conduct 5 Phase II ESAs from out of the 15 Phase I ESAs. It is estimated that four of these sites will be completed at \$26,000 per site for the smaller properties and one for \$52,000 for the larger cotton salvage yard, which equals a total cost of \$156,000. This cost will be split evenly between the budget for petroleum and hazardous sites, which equals \$78,000 for petroleum sites and \$78,000 for hazardous sites. These estimated costs will likely vary from site to site. Phase II ESAs will be performed in accordance with state and/or federal ESA standards and/or state UST standards for performing environmental assessments and will be governed by QAPPs and Health and Safety Plans that will receive prior EPA approval before beginning the Phase II ESAs. The Phase II ESAs will focus on the nature and extent of contamination so that cleanup alternatives and estimated cleanup costs for redevelopment purposes can be determined. Outcomes for this task include: number of sites assessed, number of acreage assessed, number of sites ready for reuse, and number of sites needing further remediation.

Task 5, Cleanup Planning: We estimate completing clean-up plans for four sites at an estimated cost of \$10,000 per site for a total cost of \$40,000. Approximately one-half of the cleanup planning will be conducted on petroleum sites, therefore \$20,000 of the total cost is budgeted for petroleum sites and \$20,000 is budgeted for hazardous sites. This task involves preparing an Analysis of Brownfields Cleanup Alternatives (ABCA), which will include conducting a feasibility study of remedial options and estimating cleanup costs based on specific or various redevelopment scenarios for the sites where Phase I ESAs and/or Phase II ESAs were performed. The majority of this task will be conducted by the environmental consultant selected to perform the assessments. Existing economic development plans and public input through community outreach will be utilized to direct redevelopment alternatives. Outcomes for this task include: number of sites and acreage redeveloped, number of dollars leveraged, number of jobs created, and the amount of new taxes generated by redeveloped sites.

2.b.ii. Budget Table

The proposed budget for the EPA Community-wide Assessment Grant is presented in the following tables:

Budget for Petroleum Assessment Grant Funds

Budget Categories	Tasks					Total
	(Task 1) Project Management	(Task 2) Community Outreach	(Task 3) Phase I ESA	(Task 4) Phase II ESA	(Task 5) Cleanup Planning	
Personnel	\$5,250					\$5,250
Fringe Benefits						
Travel	\$5,000					\$5,000
Equipment						
Supplies		\$3,000				\$3,000
Contractual	\$3,250	\$5,000	\$28,500	\$78,000	\$20,000	\$136,750
Other						
Total	\$15,500	\$8,000	\$28,500	\$78,000	\$20,000	\$150,000

Budget for Hazardous Assessment Grant Funds

Budget Categories	Tasks					Total
	(Task 1) Project Management	(Task 2) Community Outreach	(Task 3) Phase I ESA	(Task 4) Phase II ESA	(Task 5) Cleanup Planning	
Personnel	\$5,250					\$5,250
Fringe Benefits						
Travel	\$5,000					\$5,000
Equipment						
Supplies		\$3,000				\$3,000
Contractual	\$3,250	\$5,000	\$28,500	\$78,000	\$20,000	\$136,750
Other						
Total	\$15,500	\$8,000	\$28,500	\$78,000	\$20,000	\$150,000

c. Ability to Leverage

Stanton has been able to increase its revenue over the past 10 years; however, this was partially driven by \$4.7 million in grants the Town has been awarded since our mayor took office. We did have a small decrease in revenue from 2014 (\$687,910) to 2015 (\$587,454); however, that difference is attributable to fluctuations in grant expenditures being paid, or grant funds being deposited as of the end of the fiscal year. The great recession of 2008 put a lot of people out of work. Approximately 50% of Stanton residents now live below the Federal poverty line. To help feed people, we have planted the Stanton Orchard, which provides free fruit for residents. To help people preserve their garden produce for the winter, we subsidize the Stanton Cannery. The Cannery provides cannery equipment, training, and utilities for low income residents to can their garden produce, so they will have healthy food to eat during the winter. We also subsidize the Stanton Health Clinic by charging below market rental on the Clinic building. In turn, the Stanton Health Clinic provides reduced rate or free medical services for residents of Stanton, Haywood County, and the surrounding counties. Due to the high percentage of people in poverty in Stanton, this remains their only access to healthcare (due to limited ability to pay for co-pays, premiums, medicine, transportation to medical facilities, etc.). The Town of Stanton has some remaining grant funding of the \$375,000 from the 2012 THDA Home Housing Rehabilitation Program that can be used to help rehabilitate properties that are located near the Brownfields sites by testing properties that could cause major health risks. As there are several

brownfields located in the town, the majority of the residents live on or near these sites. Additionally, the City can leverage some funding from their \$1,000,000 Community Development Block Grant (CDBG) for Disaster Improvements that can be used for testing the brownfields sites for contaminants.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

3.a. Engaging the Community

3.a.i. Community Involvement Plan: The Town will delegate the preparation of the draft Community Involvement Plan (CIP) to the selected contractor. The CIP will be one of the topics of the kick-off meeting described further below. We want the community to tell us the best way to get them information about project progress and get their feedback in return. We also want a plan to communicate the assessment findings to potential investors and redevelopers who are located out of town. There are a total of 6 people in the Town of Stanton who speak a language other than English at home (Spanish). So far there has not been any communication problem with this family; however, the Town will provide Spanish translation at meetings and for project documents upon request. The goal of the CIP will be to outline project objectives; provide project descriptions; outline the site selection process; describe how the community and stakeholders can get involved in the decision making process; outline the projected meeting schedule, and establish the location and purpose of the document repository.

3.a.ii. Communicating Progress: On October 4, 2016, the Town of Stanton held a community outreach meeting to explain the brownfields program and solicit feedback. Besides the mayor, 11 citizens attended the meeting. This may not sound like much, but in a town with about 240 citizens over the age of 20 this was a good turnout. In addition, our citizens showed great interest in the brownfields program and had many constructive comments. It was commented that all of the basic services had left town including two grocery stores, a dime store, a department store, the Dairy Queen, and the local school. Now our citizens have to drive 10 miles to Brownsville to shop even for the most basic services or go to school. When nearly 1 in 4 households don't own a vehicle, this is a problem. Our citizens had a specific interest in the development of some of the vacant lots in the town center. They would like to see one vacant lot redeveloped as a food bank. They were very upset that a prospective mop factory backed out of using another vacant lot due to perceived environmental problems. This would have brought many job opportunities to the community. When we are awarded this grant and an environmental contractor is selected, Stanton will hold a "kick-off" meeting inviting all project partners and the community. The kick-off meeting will discuss and set project objectives, responsibilities, priorities, and schedule. The attendees will be informed about the document repository that will be established at Town Hall. Additional community meetings will be held on at least a semi-annual basis for the duration of the grant. In addition to presenting project progress to the town, we also envision these meetings as an opportunity to reach out to potential investors and redevelopers. The Town of Stanton is small. We do not have a website, a Facebook page, a newspaper, or a TV station. What we do have is a tight-knit community in which everyone knows each other and communicates without difficulty by word of mouth. The Mayor knows everybody's phone number and routinely calls town meetings by going down the list. Maybe this is old-fashioned, but it is effective. When the Mayor personally calls and says "I think you need to be at this meeting", it usually gets results. It may be too late, but that mop factory will also get a call from the Mayor after we assess that vacant lot they had concerns about. The Town will also advertise upcoming meetings on the billboard in front of Town Hall. In a town this size, nearly everyone sees that billboard in the course of a day. A document repository will be located at Town Hall and will include: meeting materials, copies of project reports, project goals, monthly project updates, and a feedback form to further ensure input is received and reviewed at all phases of the project. Responses to feedback will also be placed in the repository. The repository will be updated quarterly by the Town with assistance from the environmental consultant. Specifically, the consultant will prepare most materials, and Town personnel will physically place the project documents in the repository.

3.b. Partnerships with Government Agencies

3.b.i. Local/State/Tribal Environmental Authority

Tennessee Department of Environment and Conservation (TDEC) – The TDEC is expressly interested in seeing entities like the Town of Stanton take the initiative to return these sites to productive uses. In cooperation with Region 4 EPA, the TDEC brownfields staff will provide technical support and oversight for this grant.

3.b.ii. Other Government Partnerships

United States Environmental Protection Agency (EPA) – The EPA Brownfields Program provides assistance through partnership with communities by providing grants, technical assistance and support to assess, cleanup and place brownfield sites into economically sustainable reuse.

- Tennessee Department of Health – The Tennessee Department of Health will partner with Stanton to provide statistical health data for the Town and will assist with evaluation of that data relative to potential adverse health effects from brownfields.
- HTL Advantage – Is a three county economic development coalition that began with a set of specific goals on how to improve existing businesses and how to bring new industries into Haywood, Tipton, and Lauderdale (HTL) counties. Improving the workforce and education skill level is vital in attracting new industries and businesses to the area. To support the Brownfields Grant, we can assist these training centers and groups with developing training to support new job openings created through grant activities. We can advertise properties that have been assessed on our website and provide guidance for redevelopment of these areas.
- Tennessee Department of Economic and Community Development (TDECD) – This state economic development organizations helps support to support business development and is committed to attracting new industry to the Mega Site near Stanton and to locate at brownfield sites through continual marketing efforts.
- University of Tennessee, Brownsville – Has a Workforce Development Center that provides training for new businesses coming into the county. The college will provide training as needed for businesses willing to move into redeveloped brownfield sites.

3.c. Partnerships with Community

c.i. Community Organization Description and Role

3.c.i. Key Community Based Organizations:

The following organizations have entered into a partnership role for this project: Their letters of Commitment are also contained in attachment “B”.

- Brownsville Chamber of Commerce – The principal mission is to advance the business interests of its members through advocacy, leadership and business-building initiatives. In support of the grant, we can provide advertising of assessed properties both directly to businesses that contact us and indirectly through their website. They can work with new and expanding businesses to fill their employment needs and serve on committees to provide grant advice from an economic perspective. Their expertise and technical advice will be available any time for the duration of the grant.
- Brownsville Rotary Club – The goal of Rotary – and the Brownsville Rotary Club – is to support initiatives promoting peace, fighting disease, providing clean water, saving mothers and children, supporting education, and growing local economies. The Rotary Club has pledged support for this project and their help in whatever way they can. They understand that community outreach is extremely important and are willing to help spread the word about grant meetings and progress. Their members would be like to serve on committees and assist with educational presentations about Brownfields to ensure that the community understands the importance of this project.
- Stanton Preservation Trust, Inc. – The Stanton Preservation Trust is deeply committed to the preservation of historic buildings in Stanton. They pledge support to the town in its initiatives for growth and preservation, particularly with the Brownfields Assessment grant.

To support this initiative, the organization can assist with public outreach and communication. They can also help identify and locate properties that may qualify as brownfields and serve on committees for the grant.

- **Stanton Feeding Haywood Food Pantry Association (Feeding Haywood)** – Feeding Haywood operates a charitable food pantry as an independent, non-profit Association to serve those who need food assistance in Stanton/Haywood County. Those most at risk in our community are the biggest concern to us, which is why we feel the Brownfields Grant is so important. Their volunteers can help keep the community informed about grant activities. They can add their voices to your committees and help locate properties that need to be assessed for contamination.
- **St. John Baptist Church** – The congregation actively pursues ways in which we can meet their community's needs, especially those who might be poor or hungry. In support of the Town's Brownfields program, they can offer their church buildings as a meeting space. They can also participate in committees and meetings to offer ideas and suggestions as to what might be done with these properties that would benefit the community the most.

3.c.ii. Letters of Commitment-

Letters of commitment are included in Attachment 2.

3.d Partnerships with Workforce Development Programs

The Town of Stanton has partnered with two workforce development programs. The first, University of Tennessee, Brownsville is responsible for workforce development efforts in West Tennessee (UT Brownsville). UT Brownsville will assist the Stanton with workforce development and training by ensuring appropriate training is offered to fill new jobs created through grant activities. The second is **HTL Advantage**. HTLs provides workforce training to create quality workforce solutions in three west Tennessee counties, Haywood, Tipton, and Lauderdale. MTC pledges financial training support for redevelopment.

4. PROJECT BENEFITS

4.a. Welfare, Environmental, and Public Health Benefits

Welfare: Stanton would realize a host of benefits from redevelopment within the town. A primary welfare benefit would be the creation of jobs. The mill property, if redeveloped, has the capacity to almost eradicate unemployment in Stanton. The site has the capacity to easily support 100 workers or more based upon past employment levels and the size of the property. The employment of citizens within Stanton would create a positive ripple effect. More employed people in Stanton would reduce poverty, reduce income inequality, fill vacancies, increase the need for goods and services, and would facilitate redevelopment throughout the town. Another benefit of redeveloping sites in Stanton would be the removal of blight. Several of the existing buildings are in need of repair, which redevelopment would bring. The investment in the community would bring more walkability for the 22.1% with no vehicle available. Supply often follows demand and a greater population of employed workers rising above the poverty level would generate a greater demand for the services that are absent in Stanton; grocery stores drug stores, retail stores, restaurants, doctors, dentists, and recreational facilities. The overall quality of life would increase for some residents that are commuting long distances to work if more local jobs were available.

Environmental: The overriding environmental benefit from being awarded the EPA Community-wide Assessment Grant is protection of Stanton's water supply. As stated previously, the water well that supplies the town's water is located less than 400 feet south of the open field where contaminated cotton has been dumped for years. This issue needs immediate attention. The sooner that it is addressed through this assessment grant, the sooner that any contamination in groundwater can be stopped from migrating into the well. Undoubtedly, the pumping of the well is drawing the groundwater beneath the mill and dumping area towards the well. In addition, more infill development would reduce the demand on natural resources. Since

all of the infrastructure that is needed for redevelopment is already in place, sustainable reuse would be achieved. Many of the bricks and building materials in the abandoned structures in Stanton could be recycled, further reducing demand on the environment as opposed to new construction in greenspace. In addition, typically uncontrolled runoff is more properly managed at brownfield sites when they become redeveloped. Downtown Stanton sits on the side of a hill facing south towards the Cotton Salvage Mill and public water well. Better control of the runoff from sites such as the former dry cleaners and gas station on Main Street would ultimately reduce what is moving into the local ditches and ultimately into groundwater or local streams.

Public Health: Haywood ranks in the top three worst counties of the 95 counties in the state for health factors and 79th for health outcomes based on countyhealthrankings.org. These statistics would likely improve over time by addressing the brownfields sites. By addressing sites like the former cotton salvage mill, the former dry cleaners, gas stations and abandoned buildings in town, the local citizens of Stanton would have a reduced exposure to contaminants like benzene, and asbestos. This reduced exposure would also lower cancer risk, especially to the higher percentage of sensitive populations that exist in Stanton like the children under 5 years of age comprising approximately 11% of the population and those with a disability comprising approximately 19%. Addressing these contaminated properties would also lead to healthier food choices. For example, addressing sites like the site adjacent to the community garden would allow expansion of the garden and more fresh fruits and vegetables available for the community.

4.b. Economic and Community Benefits: Redevelopment of brownfield sites in Stanton would bring numerous economic and community benefits. The former cotton salvage mill could support from 50 to 100 or more jobs if redeveloped, which would in turn increase the tax base for the town. It is almost certain that the increase in jobs would decrease the high vacancy rate of housing in Stanton, which would also help drive up the property values in the process. As previously shown, the mean housing value in Stanton is over \$100,000 less than the average housing value in Tennessee. Redevelopment of the mill property would also serve as a catalyst for spurring more economic growth. More jobs would increase the demand for goods and services that would result in more tax revenue for the town to use for capital projects.

Another economic benefit of redevelopment of the brownfield properties is that the developer could save between 10 to 25% of redevelopment cost through the use of existing materials and infrastructure. Community benefits like improving the overall appearance of Stanton would be achieved through redevelopment of the brownfield properties. The expansion of the community garden could also occur if the adjacent brownfield properties were addressed. Stanton subsidizes the local Stanton Cannery. More income for the town would benefit the cannery even more so. The Cannery provides Cannery equipment, training, and utilities for low income residents to can their garden produce, so they will have healthy food to eat during the winter. In addition, jobs in a town as small as Stanton would also produce more walkability from the new job creation, which would also encourage more healthy physical activity and socialization of the town's residents.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

5.a. Audit Findings:

The Town of Stanton has an exceptional history of managing federal grants, and has never received any "adverse audit findings" under an OMB Circular A-133 Audit.

5.b. Programmatic Capability: Stanton is a small town in West Tennessee with a very small number of employees. Stanton has received over \$4.7 Million in grants over the last 8 years and is close to announcing an additional \$2 Million in grants. Obtaining and managing these grants requires a different strategic approach than the approach typically used in larger municipalities with more resources.

Expenditure of funds and grant accounting follow a multi-stage process. First, any requests for expenditure of funds must come from the grant administrator in writing to the Mayor and the

Town Recorder. The Mayor approves the expenditures after checking all pertinent documentation and knowledge of the status of the grant project. The Town Recorder then writes the check and submits it to the Mayor for final approval and signature. Independently, the Town's Chief Municipal Financial Officer inspects the expenditures and the grant documentation monthly, ensuring that all expenditures and reconciliations were completed accurately. The Town of Stanton also contracts with an outside auditing firm that is cognizant of all town grants, and incorporates all grants into the annual audit. Finally, the audit is submitted to the Tennessee Comptroller for review.

The status of all grants and associated expenditures are presented to the public and to the Stanton Board of Aldermen every month at the Stanton Board of Mayor and Aldermen meeting. Any questions/concerns from the Board or from the public are addressed in this monthly forum. The Town Recorder and/or a member of the Board of Aldermen will serve as a backup to the Mayor in his grant manager role. Because the Board of Mayor and Aldermen have been consulted on an ongoing basis, and status updates have been regularly provided to the Board, the person selected for the alternate capacity will be fully aware of the status of the grant and any pertinent details will be provided, should an alternate be required. The person selected in an alternate capacity is typically determined in part by the type of grant, the organizations involved, and the stage of completion for the grant. In the event of an extreme case, an alternate for the grant manager role could be selected from the original team of experts and/or consultants.

Dr. Allan Sterbinsky is the Mayor and has 25 years of experience with grant writing, administration, and management. This experience has included governmental, business, and educational organizations.

5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes: The Town of Sesser plans on tracking, measuring, and evaluating our project's progress by employing the following:

- Kickoff meeting and regularly scheduled stakeholder and community meetings.
- Quarterly document repository updates.
- Tracking of all program outputs via development of quarterly reports/performance reports.
- Preparation and timely submittal of MBE-WBE forms and financial status reports.
- Preparation of property profile information on the targeted sites and ACRES updates after major project milestones.
- Reporting of outcomes via site profile updates and quarterly reports/performance reports.

5.d. Past Performance and Accomplishments

i The Town of Stanton has not previously received an EPA Brownfields grant, however, has received \$4.7 Million in grants in the past 10 years.

ii **Accomplishments:** The Town of Stanton has never received an EPA Brownfields grant, however, we have received and completed (or are in the process of completing) the following five grants. We have received additional grants, however, we chose five for illustrative purposes.

1. \$500,000 Housing Grant (Completed)

2011 Community Development Block Grant (GG-12-38623-00)

The purpose of this grant was to provide housing rehabilitation to a targeted low-income neighborhood which surrounds Town Hall. A total of seven owner-occupied homes were rehabilitated, which directly impacted 13 people. An independent grant writer and grant administrator was used with this project as well as direct grant oversight by the Mayor. The work of all contractors was inspected by state and local inspectors, as well as by the Mayor. The project was successful in replacing homes and providing residents with adequate housing.

2. \$750,000 Disaster Grant (Completed)

2009 – D Stanton Disaster Improvements (GG-10-34054-00)

The purpose of this grant was to mitigate the effects of flooding in Stanton. The main drainage pathway through town was cleared, two sets of drainage systems were constructed along a main artery, and a drainage tunnel was constructed under the railroad. Multiple

Federal and State agencies were involved with this grant (e.g., Corps of Engineers, Department of the Interior, Department of Environment and Conservation). An independent grant writer and administrator was used with this project, as well as grant management by the Mayor. The work of all contractors was inspected by state and local inspectors, as well as by the railroad engineers and the Mayor. This project helped eliminate flooding in specific areas of Stanton and provided the linkages for further improvements in other areas of town.

3. \$1,000,000 Disaster Grant (In Process)

2012 – CDGB – D Stanton Disaster Improvements (Contract #38069)

This grant was designed to mitigate flooding in Stanton as well as to improve preparedness for disasters. The grant funded the purchase of a 4 wheel drive brush truck for firefighting, two natural gas generators for the fire department and Town Hall, improvements in the main drainage ditch in town, as well as addressing drainage issues throughout town. An independent grant writer and administrator was used with this project, as well as grant management by the Mayor. The work of all contractors was inspected by state and local inspectors, as well as by the Mayor. The ability of the fire department to provide services to Stanton and surrounding areas of the county were vastly improved. Additionally, residents of Stanton now have a location to which they can congregate when storms interrupt power to the town. Also, dangerous ditches in town will be safer, erosion on the main drainage ditch will be mitigated, and flooding on Main Street will be addressed.

4. \$375,000 Housing Grant (In Process)

2012 THDA Home Housing Rehabilitation Program (Contract #HM-12-22)

Many houses in Stanton are substandard, so we applied for a THDA grant to assist low income homeowners rehabilitate their homes. Stanton has completed rehabilitation of three homes to date and is on track to complete another 4 or 5 homes. An independent grant writer and administrator was used with this project, as well as grant management by the Mayor. The work of all contractors was inspected by state and local inspectors, as well as by the Mayor. This project allows residents of Stanton to remain in their homes, which have now been renovated. Additional renovations to substandard houses in Stanton will be completed.

5. \$500,000 Lagoon Grant (In Process)

2015 Community Development Block Grant ((B-15-DC-47-0001)

The sewage lagoon and sewage infrastructure in Stanton had degraded over the years and required substantive renovation. The project included the replacement of the sewer lift station, and raising of the levee surrounding the sewer lagoon. An independent grant writer and grant administrator were used for this project. The grant process was managed by the Mayor, who also had oversight of the construction process. Inspectors from the engineering firm and the grant administrator were heavily involved in the process. Additionally, inspectors from the state will conduct their final review of the project once it is completed. This grant prevented collapse of the berms at the sewage lagoon and provides uninterrupted sewage service to residents (i.e., replacement of antiquated sewage pumps at the lift station).

2. Compliance with Grant Requirements: Town staff members have a successful track record of managing federal and state grants. The above projects were either completed on time, in compliance with the work plan, schedule, and terms and conditions, or are still on-going with no issues or adverse audit findings.

DATA UNIVERSAL NUMBER SYSTEM (DUNS) VERIFICATION

City of Stanton DUNS: 099171043

CITY OF STANTON, TENNESSEE

THRESHOLD CRITERIA

1. Applicant Eligibility: The grant applicant is the City of Stanton, Haywood County, Tennessee. The City is eligible as a grant applicant as it is a general purpose unit of a "Local Government" as defined under 40 CFR Part 31.

The Town will delegate the preparation of the draft Community Involvement Plan (CIP) to the selected contractor. The CIP will be one of the topics of the kick-off meeting described further below. We want the community to tell us the best way to get them information about project progress and get their feedback in return. We also want a plan to communicate the assessment findings to potential investors and redevelopers who are located out of town. There are a total of 6 people in the Town of Stanton who speak a language other than English at home (Spanish). So far there has not been any communication problem with this family; however, the Town will provide Spanish translation at meetings and for project documents upon request. The goal of the CIP will be to outline project objectives; provide project descriptions; outline the site selection process; describe how the community and stakeholders can get involved in the decision making process; outline the projected meeting schedule, and establish the location and purpose of the document repository.

On October 4, 2016, the Town of Stanton held a community outreach meeting to explain the brownfields program and solicit feedback. Besides the mayor, 11 citizens attended the meeting. This may not sound like much, but in a town with about 240 citizens over the age of 20 this was a good turnout. In addition, our citizens showed great interest in the brownfields program and had many constructive comments. It was commented that all of the basic services had left town including two grocery stores, a dime store, a department store, the Dairy Queen, and the local school. Now our citizens have to drive 10 miles to Brownsville to shop even for the most basic services or go to school. When nearly 1 in 4 households don't own a vehicle, this is a problem. Our citizens had a specific interest in the development of some of the vacant lots in the town center. They would like to see one vacant lot redeveloped as a food bank. They were very upset that a prospective mop factory backed out of using another vacant lot due to perceived environmental problems. This would have brought many job opportunities to the community. When we are awarded this grant and an environmental contractor is selected, Stanton will hold a "kick-off" meeting inviting all project partners and the community. The kick-off meeting will discuss and set project objectives, responsibilities, priorities, and schedule. The attendees will be informed about the document repository that will be established at Town Hall. Additional community meetings will be held on at least a semi-annual basis for the duration of the grant. In addition to presenting project progress to the town, we also envision these meetings as an opportunity to reach out to potential investors and redevelopers. The Town of Stanton is small. We do not have a website, a Facebook page, a newspaper, or a TV station. What we do have is a tight-knit community in which everyone knows each other and communicates without difficulty by word of mouth. The Mayor knows everybody's phone number and routinely calls town meetings by going down the list. Maybe this is old-fashioned, but it is effective. When the Mayor personally calls and says "I think you need to be at this meeting", it usually gets results. It may be too late, but that mop factory will also get a call from the Mayor after we assess that vacant lot they had concerns about. The Town will also advertise upcoming meetings on the billboard in front of Town Hall. In a town this size, nearly everyone sees that billboard in the course of a day. A document repository will be located at Town Hall and will include: meeting materials, copies of project reports, project goals, monthly project updates, and a feedback form to further ensure input is received and reviewed at all phases of the project. Responses to feedback will also be placed in the repository. The repository will be updated quarterly by the Town with assistance from the environmental consultant. Specifically, the consultant will prepare most materials, and Town personnel will physically place the project documents in the repository.

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-16-08

* Title:

FY17 Guidelines for Brownfields Assessment Grants

13. Competition Identification Number:

NONE

Title:

None

14. Areas Affected by Project (Cities, Counties, States, etc.):

1235-City Limits Map.pdf

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

2017 City of Stanton Community-wide Assessment Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

8th

* b. Program/Project

8th

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2017

* b. End Date:

09/30/2020

18. Estimated Funding (\$):

* a. Federal

300,000.00

* b. Applicant

0.00

* c. State

0.00

* d. Local

0.00

* e. Other

0.00

* f. Program Income

0.00

* g. TOTAL

300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Allan

Middle Name:

* Last Name:

Sterbinsky

Suffix:

* Title:

Mayor

* Telephone Number:

731-548-2565

Fax Number:

* Email:

allan.sterbinski@gmail.com

* Signature of Authorized Representative:

Allan Sterbinsky

* Date Signed:

12/22/2016

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

12/22/2016

4. Applicant Identifier:

5a. Federal Entity Identifier:

620676932

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Stanton, Tennessee

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

620676932

*** c. Organizational DUNS:**

0991710430000

d. Address:

*** Street1:**

8 Main Street

Street2:

*** City:**

Stanton

County/Parish:

*** State:**

TN: Tennessee

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

US: 38069

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

*** First Name:**

Allan

Middle Name:

*** Last Name:**

Sterbinsky

Suffix:

Title:

Mayor

Organizational Affiliation:

*** Telephone Number:**

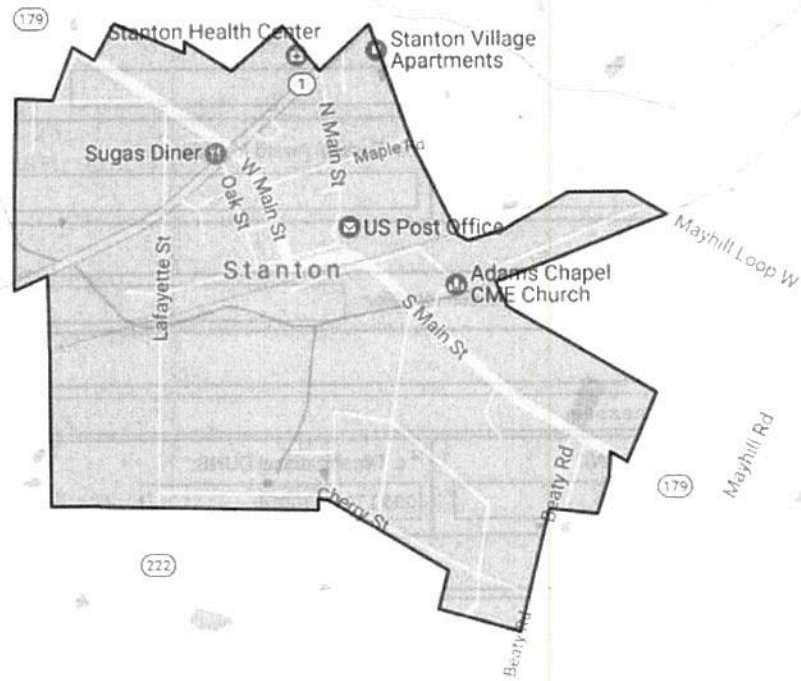
731-548-2565

Fax Number:

*** Email:**

allan.steribinski@gmail.com

City of Stanton, Tennessee City Limits





Upper Cumberland Development District

"Providing Solutions through Regional Cooperation"

R04-17-A-080

December 15, 2016

Barbara Alfano/US Environmental Protection Agency Region 4
Atlanta Federal Center
61 Forsyth Street, S.W. 10th FL
Atlanta, GA 30303-8960

a. Applicant Identification

Upper Cumberland Development District
1225 South Willow Ave.
Cookeville, TN 38506

b. Funding Requested

- i) Assessment
- ii) Community-wide
- iii) \$277,000
- iv) both: \$193,000 Hazardous Substances; \$84,000 Petroleum

c. Location: Upper Cumberland region, Tennessee. This fourteen-county region includes the following counties: Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, and White. Target counties for this application are Jackson, Overton, Van Buren, and White.

d. Property Information

N/A—The UCDD is applying for a Community-Wide Assessment Grant.

e. Contacts

i) Project Director

Allison Fox
931-476-4106; afox@ucdd.org
1225 S. Willow Ave./Cookeville, TN/38506

ii) Chief Executive

Mark Farley, Executive Director
931-476-4169; mfarley@ucdd.org
1225 S. Willow Ave./Cookeville, TN/38506



Upper Cumberland Development District

"Providing Solutions through Regional Cooperation"

f. Population

- i) Upper Cumberland fourteen-county district estimated population: 345,381
- ii) Target county populations are listed in the table(s) on pages 2-3 of this proposal.
- iii) The Upper Cumberland region includes one county experiencing persistent poverty—Fentress County.

g. Regional Priorities Form/Other Factors Checklist

The Regional Priorities Form/Other Factors Checklist is attached to this Cover Letter.

h. Letter from State Environmental Authority

A letter of acknowledgement of this application from the Tennessee Department of Environment and Conservation (TDEC) Brownfields Coordinator, Paula Larson Middlebrooks, is attached to this Cover Letter.

On behalf of the fourteen-county region we serve, the Upper Cumberland Development District (UCDD) seeks a 2017 EPA Brownfields Assessment Grant. The UCDD strives to assist our region in the pursuit and implementation of activities that drive economic and community development. We believe that EPA Brownfields funding will help accelerate holistic growth in our rural communities, many of which experience high levels of poverty.

The UCDD has successfully administered two prior EPA Brownfields Assessment Grants, which fulfilled brownfield assessment efforts and leveraged funds to revitalize several blighted properties in our region. We hope to continue this positive redevelopment through EPA grant programs such as this one.

Thank you for your consideration of this proposal.

Sincerely,

Mark Farley
Executive Director

1. COMMUNITY NEED

a. Target Area and Brownfields

i. Community and Target Area Descriptions

Located in the northeastern portion of Middle Tennessee, the Upper Cumberland Development District (UCDD) is one of nine development districts in the state which serves its counties by providing regional planning and economic development resources and assistance. These development districts were established by the TN General Assembly in 1965. The UCDD serves the following fourteen counties in the region: Cannon, Clay, Cumberland, DeKalb, Fentress, Jackson, Macon, Pickett, Putnam, Overton, Smith, Van Buren, Warren, and White. This district encompasses 5,093 square miles and is home to 345,381 residents. Situated equidistant from the metropolitan areas of Nashville, Knoxville, and Chattanooga, the region is largely comprised of rural and isolated areas that experience elevated poverty and unemployment rates; the fourteen counties served by the Upper Cumberland Development District have an average poverty rate of 21.1%, which is well above both the state and national poverty rates. The Upper Cumberland is part of the Appalachian region and falls under Appalachian Regional Commission (ARC) legislation. Each year ARC creates a national index of county economic status through a comparison of each county's averages for three economic indicators—three-year average unemployment rate, per-capita market income, and poverty rate—with national averages. For FY2017, ARC has ranked two Upper Cumberland counties as economically 'distressed' (Fentress, Van Buren) and nine counties as 'at-risk' of becoming distressed (Macon, Clay, Pickett, Overton, Jackson, Putnam, DeKalb, White, Warren).

The cities and counties of the Upper Cumberland were largely founded in timbering and coal mining operations, which over time stripped the region of many natural resources. Tailing the end of the Industrial Revolution, the region developed industrial and manufacturing operations in the late 1930s to catch up to national needs. Isolation has stunted much of the region's abilities to continue adapting to changing times. Due to the changing industrial landscape, many industries have closed in recent decades, removing key economic drivers from these rural communities and resulting in a relatively high percentage of the population unemployed, under-educated, and financially struggling. One significant roadblock in addressing workforce needs is the lack of marketable industrial real estate in the region to attract developers.

Though economically unstable, the Upper Cumberland region has a wealth of natural beauty and assets, drawing tourists and outdoor enthusiasts to our many lakes, rivers, waterfalls, caves, hiking trails, and camping areas. The region is home to sixteen state parks and one national park. In order to maintain greenspace and the scenic lands that attract a tourism base to the region, land is limited for industrial development. The region must seek to market existing industrial sites, many of which are blighted and likely contaminated brownfields. Across the fourteen-county region, the UCDD has begun to identify and cultivate an initial inventory of potential brownfield sites in need of assessment, seeking to begin the process of positive redevelopment of currently un- or under-used sites in our communities. Local government officials have suggested priority sites based on economic need of the targeted communities and redevelopment of potential sites with an industrial background that are likely contaminating our communities. For this application, the UCDD will focus on Jackson, Overton, Van Buren, and White counties. Each of these target counties and cities where

brownfields are located has higher poverty rates than the region, state, and national averages. The focus counties for this application are all either 'distressed' or 'at-risk,' according to the ARC.

ii. Demographic Information and Indicators of Need

As evidenced in the data below, the entire Upper Cumberland region, and the target counties and cities within, experiences poverty rates significantly higher than the state and national rates (17.8% and 15.6%, respectively). Represented in these tables are the target counties, as well as the cities and in Sparta, the census tract, in which the priority brownfield sites are located. In the case of sites in Livingston and Spencer located inside the city limits, the Census tracts of the brownfield sites span areas beyond the city limits, so only city-level data has been provided. Census tract-level data is not provided for the former Eaton Corporation sites, located in Jackson County, as they are not located in residential areas. Minorities represented in these statistics include any race except 'white,' the most significant of which are Hispanic and African-American across the Upper Cumberland region.

Color key (data sources):

US Census Bureau 2015 Population Estimates

TN Dept. of Labor and Workforce Development

US Census Bureau American Community Survey, 2010-2014

US Census Bureau 2010 Census of Population

	Jackson County	Gainesboro (Jackson County)	Overton County	Livingston (Overton County)	Upper Cumberland Region	Tennessee	National
Population	11,509	955	22,129	4,071	345,381	6,600,299	314,107,084
Unemployment	7.40%	N/A	5.50%	N/A	5.40%	5.00%	5.0%
Poverty Rate	24.10%	38.40%	22.40%	34.60%	21.10%	17.80%	15.60%
Percent Minority	3.20%	12.90%	2.90%	6.20%	6.80%	24.40%	37.2%
Median Household Income (\$)	33,500	22,750	34,913	30,760	35,787	44,621	\$53,482
Percent Children	20.37%	26.30%	23.23%	21.50%	22.11%	23.57%	24.03%
Percent Elderly	25.57%	28.10%	24.00%	28.80%	24.24%	19.29%	18.49%

	White County	Sparta (White County)	Sparta Census Tract 9354	Van Buren County	Spencer (Van Buren County)	Upper Cumberland Region	Tennessee	National
Population	26,521	5,096	3,748	5,677	1,634	345,381	6,600,299	314,107,084
Unemployment	5.30%	N/A	N/A	6.20%	N/A	5.40%	5.00%	5.0%

Poverty Rate	22.10%	30.20%	33.20%	21.60%	25.60%	21.10%	17.80%	15.60%
Percent Minority	5.20%	7.90%	9.60%	2.50%	1.30%	6.80%	24.40%	37.2%
Median Household Income (\$)	33,933	24,035	22,654	34,250	28,750	35,787	44,621	\$53,482
Percent Children	22.46%	16.50%	21.60%	20.85%	19.30%	22.11%	23.57%	24.03%
Percent Elderly	24.34%	32.10%	27.90%	25.34%	27.60%	24.24%	19.29%	18.49%

iii. Brownfields and Their Impacts

The Upper Cumberland region has many former industrial sites, mills, and gas/service stations that sit vacant and unproductive, detracting from the community instead of contributing positively. Based on discussions with local government officials, the UCDD has begun a running inventory of priority sites, which currently includes nearly thirty individual sites throughout the region. Below are details about the target priority sites.

Jackson County: Jackson County's two Eaton Corporation manufacturing facilities left 115 individuals out of work when they closed their doors in August and November 2016. The facilities manufactured various parts used in hydraulics, heavy truck markets, and the propane industry. The closure was due to an outsourcing of work to other suppliers outside the Upper Cumberland region, across the US and overseas. In a February 2016 article by the Upper Cumberland daily *Herald-Citizen* newspaper, Jackson County Mayor Bobby Kinnaird said, "This is really a big blow for us. It's 40 percent of our manufacturing workforce. A lot of these employees live here in Jackson County. They'd have to travel out of county to find work." EPA Brownfields Assessment funds could assist the county in preparing the former Eaton sites to market to manufacturing companies looking to locate to the area. With Jackson County's elevated poverty and unemployment rates (24.1% and 7.4%, respectively), industrial recruitment to the area would be a welcome and beneficial use of the former Eaton plants. With rolling topography, limited infrastructure, and some land being located in a flood plain, the county has no other available land or facilities to market to prospective industries.

Overton County: The town of Livingston in Overton County has at least one priority brownfield site in the city limits, which is the former Livingston Sawmill. Located behind the county jail and adjacent to residential properties, this site was an operating sawmill for nearly thirty years, closing in 2015. Sawdust created by the working mill has caused maintenance problems for the jail, as well as potential breathing issues and home maintenance problems for the surrounding neighbors of the site. The town of Livingston has a 34.6% poverty rate, well above state and national averages. Currently, the county is in need of a county services building, which would be a positive redevelopment of the sawmill site.

Van Buren County: Two sites have been identified in distressed Van Buren County (which has a population of less than 10,000) in the city of Spencer. One site, Spencer Auto Sales, is located in the historic town center and mere thirty feet from residential properties. Currently functioning as a mechanic shop and small junkyard, the site is an eyesore for the community, located on a main thoroughfare. Another former gas station located on Old State Highway 111 has been vacant for twenty years and still has underground storage tanks.

White County: Two priority sites are located in White County in the City of Sparta. One of these sites, Agee Oil, a former oil distribution center, is located in a low-income residential

area in the city of Sparta, surrounded on three sides by residential properties and very near a public housing neighborhood. This site sits in Census Tract 9354, which has a 33.2% poverty rate and significant children and elderly populations. The city has interest in transforming this blighted site into a greenway trailhead, as it is located near a portion of Sparta's current walking trail. The city has plans to continue developing this trail, which currently runs along the Calfkiller River and ends south of historic downtown, into a connected loop around the city. Another site in the county, former Scepter Hardwoods hardwood manufacturing facility, is located in a commercial zone with rail access, which is a prime location for a new industrial facility. The site has garnered developer interest, but concerns have left it vacant and challenging to market to prospective companies due to the suspected but unknown scope of the contamination. This site also sits adjacent to residential property outside the city limits.

b. Welfare, Environmental, and Public Health Impacts

i. Welfare Impacts

Tennessee ranks at number 38 out of the 50 states in overall child well-being, number 42 in economic well-being, and number 36 for educational achievement, according to the Annie E. Casey Foundation 2016 Kids Count Data Book. Children (under 18 years of age) make up 22.11% of the Upper Cumberland's population. All fourteen Upper Cumberland counties are characterized by higher poverty rates and lower median household incomes than both the state of Tennessee and the nation. Residents in these target counties and those who live near brownfield sites are more prone to environmental justice issues and safety issues, including blight, lack of resources such as healthy food options and in some cases safe walkability, and potential contamination from hazardous substances at brownfield sites.

In Overton County, Livingston's former sawmill has caused respiratory health concerns, as well as damage to nearby homes from airborne sawdust. In White County, Sparta's Agee Oil site is an eyesore in a residential area, which includes public housing. Data shows that the census tract around this site is represented by a low-income population, with nearly half the residents being under 18 years of age or over 60. Former Agee Oil has been an eyesore with visible contaminants for around ten years. Sparta Police Chief Jeff Guth stated that police and residents have noted an "oil sheen" on puddles of water at the site after a rain. As the groundwater in this residential area is undoubtedly contaminated with petroleum, there are likely health risks present that residents may be unaware of.

ii. Cumulative Environmental Issues

Environmental issues in the Upper Cumberland include agriculture and urban runoff, some of which come from brownfields. According to the EPA, agriculture is the nation's leading cause of impaired water quality. The many farming operations in the region are undoubtedly contaminating the region's waterways, as well as private wells. Of the 6620 miles of streams in the region, 472 miles are listed by the EPA as 303d impaired, which means that the daily pollution input to the water body exceeds a defined threshold of safety streams (US Geological Survey National Hydrography Dataset). Of note, much of the Upper Cumberland lies upon karst topography, a landscape in which the bedrock is dissolved by water and is characterized by caves, sinkholes, and disappearing/reappearing rivers. This presents challenges when managing water pollution and runoff, including simply not knowing where the water goes. Very little of the region's subsurface is mapped or understood, and subsurface drainage varies considerably from surface drainage. Conduits within karst do not filter contaminants, which are rapidly

transported to an often unknown location. Plumes from broken underground storage containers therefore do not behave in the way they are expected to. The table below illustrates Agricultural land, Karst geology and Urban runoff by target county as a proxy to understanding these issues and to illustrate how widespread these problems are.

Percent Landscape by Region						
	UCDD	Jackson	Overton	Putnam	Van Buren	White
Agriculture	24	14	26	23	12	34
Karst	51	56	69	62	25	73
Urban	8	5	8	16	4	9

Sources: Landscape (NLCD 2011) and TN State Geology Layer 1:250,000

In addition to simply having a lot of karst geology, there are impacts from known potential conduits to that karst geology. According the Tennessee Department of Environment and Conservation's (TDEC) Division of Water Resources, there are nearly 9,000 oil and gas wells in the Upper Cumberland region. There are also 42 landfills and 528 illegal dumping complaints in just the past five years in the region (from the TDEC Division of Solid Waste Management), and 114 TDEC Division of Remediation sites. From the Abandoned Mine Lands (AML) Program, there have been 4,737 acres of AML land identified and 226 AML sites in the Upper Cumberland region. These cumulative environmental impacts, when connected to the unique geology of the region, create quite the case for overburdening pollution issues.

The Upper Cumberland also harbors seven (7) unique ecological regions and 316 rare, threatened, or endangered species: 102 invertebrate animals, 12 nonvascular plants, 138 vascular plants, 64 vertebrate animals. These species are sensitive to runoff and contamination from brownfield sites present in the region.

iii. Cumulative Public Health Impacts

According to State Cancer Profiles (statecancerprofiles.cancer.gov), Tennessee has slightly higher incidence rates than the nation for several types of cancer, but the state has a notably higher incidence rate of lung and bronchus cancers than the USA (Tennessee rate is 76.8 compared to the USA rate of 62.4). Ten (10) of the fourteen Upper Cumberland counties have higher incidence rates than the state and national average, with Jackson, Macon, and Overton counties falling into the highest quintile (96.8-116.1). Smith, Dekalb, White, Fentress, and Pickett counties fall into the next highest quintile (89.3-96.8).

Of the 14 Upper Cumberland counties, 11 are ranked in the lower 50% for overall health outcomes among Tennessee's 95 counties, according to the 2016 County Health Rankings (CountyHealthRankings.org). Of note, Van Buren is ranked 91 out of 95 counties (with 95 being the worst), and Clay County is ranked 84. All fourteen Upper Cumberland counties are characterized by higher poverty rates and lower median household incomes than both the state of Tennessee and the nation. The region as a whole is characterized by an aging population, with 24.24% characterized as elderly by the US Census Bureau 2010 Census; this number is now likely higher. Every target area has a higher elderly population than the regional average; these elderly residents living around brownfields are potentially sensitive to their effects.

The various contaminants associated with brownfields can impact public health, particularly for those residents who live near a brownfield site. Most of the sites currently identified are located near residential areas. These sites are likely contaminated with substances such as Polycyclic Aromatic Hydrocarbons (PAH), Volatile Organic Compounds

(VOC), heavy metals, and Petroleum Hydrocarbons, which are all reasonably anticipated human carcinogens that can have various effects on human skin, lungs, and/or the immune system. Residents and workers around the Livingston Sawmill site have potentially been exposed to airborne sawdust from the former sawmill, which can cause a host of respiratory problems. Residents near the former Agee Oil site are likely exposed to petroleum through groundwater and fumes; it is well known that petroleum exposure can cause damage to nearly every organ in the human body. Due to the region's high poverty levels, it is likely that residents living near potentially contaminated sites do not have the means to relocate away from their current housing location. Health impacts are particularly concerning for elderly residents in these areas who may have weakened immune systems.

c. Financial Need

i. Economic Conditions

As aforementioned, the Upper Cumberland fourteen-county region as a whole has a higher poverty rate and lower median household income than both the state of Tennessee and the nation. Two of the region's counties (Fentress and Van Buren) are considered economically 'distressed' according to the Appalachian Regional Commission, and nine of the remaining twelve counties in the region are considered 'at-risk' of becoming distressed. Three counties in the region have a population less than 10,000, thus having a very small tax base to draw from.

In 2010, Jackson County was hit hard with two significant floods in May and August. Structures that were flooded in May's 100-year flood were nearly repaired and getting back to normal when a 500-year flood hit in August and destroyed more structures and re-flooded structures hit in the May disaster. Along with the recent Eaton Manufacturing closures in Jackson County that ended 115 jobs, this county is particularly strained economically and in need of ways to increase their low tax base.

The UCDD provides grant writing, technical assistance, and program management services to our counties, the majority of which do not have the capacity to administer large state and federal grant projects such as EPA Brownfields Assessment. With limited local funding, the individual counties do not have other sources to draw on for brownfield planning and assessment. Similarly, the UCDD does not have existing funds in our budget for the implementation of brownfields assessments. Currently, UCDD's limited funding is provided by state and federal funds designated to specific agency programs. The UCDD does have Economic and Community Development staff on hand that can assist with community outreach and grant program management and will contribute in-kind services as part of this grant project. In accordance with the EPA Region 4 priority, the UCDD will use our administrative structure to manage the Upper Cumberland brownfields program for our counties/region with limited financial resources.

ii. Economic Effects of Brownfields

There are several brownfields in the Upper Cumberland located in buildings or areas that are prime locations for industrial use; however the perceived contamination is deterring interest from potential developers. Sites in Jackson County and White County are currently in this situation. Jackson County has a low tax base, with much of the population commuting out of the county daily to work. The local manufacturing workforce took a blow with the 2016 closure of two Eaton Corporation plants, which resulted in 115 job losses. With rolling topography, limited infrastructure, and some land being located in a flood plain, the county has

no other available land or facilities to market to prospective industries. As Jackson County has very few potential industrial sites, redeveloping the current buildings for industrial use will be of great economic benefit to Jackson County and the city of Gainesboro. White County was just removed in 2016 from the Appalachian Regional Commission's 'distressed' county list and remains, with the majority of Upper Cumberland counties, in 'at-risk' status. The county's former Scepter Hardwoods plant, one of the few current industrial sites in the region with rail access, has garnered industrial developer interest in the past; however, the perceived contamination associated with this site has raised concerns from developers and makes the site difficult to market. Assessment and cleanup of this site would allow new business to locate to the county, utilize its rail access, and continue to improve the overall economic climate of White County.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

a. Project Description, Timing and Implementation

i. Project Description and Alignment with Revitalization Plans

The successful redevelopment of the brownfield sites targeted under this grant will align with the region's Comprehensive Economic Development Strategy (CEDS) 2015-2020 plan set forth by the UCDD. To prepare this document, the UCDD met with each county to identify needs and key economic development partnerships, consolidating this information into a cohesive regional vision. The CEDS identifies the greatest need as supporting industries and workforce employment needs, as well as a focus on the region's rich tourism opportunities.

The UCDD will continue to engage our communities and utilize feedback to shape redevelopment visions related to specific brownfield sites, ensuring that redevelopment projects keep at the forefront the community's health, well-being, and economic prosperity. Redeveloping brownfields in these target areas will contribute to increased access to greenspace and potential increase in tourism opportunities in the region's small towns. All brownfield redevelopment will strive to support existing communities and enhance the health and safety of existing neighborhoods. The table below outlines initial redevelopment plans for the already identified target sites in the region:

County	Site Name	Current Use	Infrastructure present	Future Redevelopment Vision
Jackson	Eaton Corporation (former)	vacant	Yes-sewer, water, roadways, broadband, gas, electric	Manufacturing facility
Overton	Livingston Sawmill (former)	vacant	Yes-sewer, water, roadways, gas, broadband, electric	county offices or more jail parking
Van Buren	Spencer Auto Sales	mechanic shop/small junk yard	Yes- water, roadways	green space/downtown public park
Van Buren	Store/gas station (former)	vacant	Yes- water, roadways	Commercial business
White	Scepter Hardwoods (former)	vacant	Yes-water, gas, broadband, roadways (sewer and electric available)	Manufacturing facility
White	Agee Oil Company (former)	vacant	Yes-sewer, water, electric, gas, broadband, roadways	Park/greenway trailhead (Rails- to-Trails path)

ii. Timing and Implementation

The UCDD has the necessary and experienced staff to administer this grant and will be responsible for project oversight, evaluation of target sites, procurement of technical services, and assistance in obtaining site access. Identification of the sites already included within the current inventory was accomplished through outreach the UCDD conducts with local cities and counties on brownfield education. Thus far, the UCDD has reached out to all fourteen counties and created an inventory of over thirty potential sites. Sites selected for assessment will be categorized based on the risk they pose to human health and the environment, near-term redevelopment, re-use feasibility, compliance with regional and local land use and planning goals, benefit to human health and welfare, community support, and project benefit (i.e. job creation, private investment, increased tax revenues). The UCDD will work with local officials and identified community organizations to keep local citizens involved throughout the assessment and planning process.

UCDD will begin the contractor procurement process immediately following work plan and cooperative agreement approval from the EPA. The UCDD has successfully crafted a streamlined process for contractor procurement, and similar to previously awarded EPA Assessment Grant funds, will ensure the consultant is experienced in setting up and managing Brownfield programs and tasks. These tasks include assistance in maintaining a Brownfields Inventory, Community Outreach, completion of Phase I and Phase II Environmental Site Assessments (ESAs), developing Quality Assurance Project Plans, completion of Analysis of Brownfield Cleanup Alternatives (ABCAs), and working with state regulators regarding solid waste and brownfield assessment redevelopment planning and remediation. UCDD will secure these services in accordance with the grant program's selection protocol and the UCDD purchasing policies within the first three months of being awarded. UCDD will follow the work plan established with EPA to ensure completion of the grant within three years. Using the sites already identified, the UCDD will be able to 'hit the ground running' and continue to engage the community in additional site selection.

The UCDD Board, which is comprised of both public and private members of the UCDD Counties and Cities, meets on a quarterly basis and has proven to be an opportune time to begin to identify additional sites. At these meetings, the UCDD Board is able to discuss public comment and concerns raised at their respective town hall meetings. This input will be utilized to shape the highest and best use of the grant throughout its duration. UCDD is a familiar and trusted resource in the targeted communities and will continue to educate the community on the benefits of promoting environmental assessment and redevelopment efforts. The Counties of the UCDD are familiar with EPA Assessment Grants and understand the necessity of garnering site-access; they will be required to address a plan of site access with the UCDD when a site is chosen for assessment. Access agreements with specific terms will be completed between the property owner and consultant. This process has proven effective and has been refined over the course of the previously awarded assessment grants. The UCDD and local officials will continue to engage local stakeholders and residents in the site selection and site access process.

b. Task Descriptions and Budget Table

i. Task Descriptions

Brownfield Inventory and Outreach: Data will be collected from the assessments throughout the duration of the grant and compiled in the ACRES database. This task will be

conducted by the UCDD staff and technical consultants. UCDD staff and consultants will also conduct community outreach and education to identify developers and stakeholder interest in order to achieve a cohesive redevelopment plan. All UCDD personnel costs will be In-kind contributions to this grant project from the UCDD general operating budget. It is anticipated that staff will conduct and/or participate in community information and education sessions over the grant period. Additionally, the UCDD will contribute supplies needed to attend outreach meetings as In-kind expenses. A total of \$10,000 (\$6,000 hazardous / \$4,000 petroleum) is anticipated to cover Travel expenses for key staff members to attend Brownfield conferences and workshops (attendance of 2 staff members @ \$5,000 per person allotted for air travel, ground transport, and lodging expenses for at least two national conferences and one regional conference). In order to improve the quality of the inventory, an additional \$2,000 (\$1,000 hazardous / \$1,000 petroleum) is budgeted for contractual services by consultants to assist in community outreach and education. **Outputs** of this task will include education/community outreach, print and web content, and staff attendance at the national brownfield conference. **Outcomes** anticipated include: seeking, discussing and implementing meaningful public input into the grant processes and education of staff on best practices in brownfield redevelopment.

Phase I ESAs: This task includes conducting approximately 15 Phase I ESAs (10 Hazardous Substances/5 Petroleum) at an approximate cost of \$3,000 each. This task budget includes consulting and reporting costs and other eligible assessment-related costs. **Outputs** include site specific eligibility determinations and Phase I ESAs, and building the ACRES database. **Outcomes** anticipated are a better understanding of potential environmental concerns to market for future redevelopment.

Phase II ESAs: This task includes conducting approximately 10 Phase II ESAs (7 Hazardous Substances/3 Petroleum) at an approximate and average cost of \$20,000 for each site based on the findings of the Phase I ESAs. Information from the Phase II ESAs will be included in the ACRES database. This task budget includes consulting costs, lab charges, work plan and reporting costs, site specific QAPP's, and other eligible assessment-related costs.

Cleanup & Redevelopment Planning: This task will involve the development of a plan to cleanup and redevelop sites within the UCDD and to develop implementation strategies and resources. This task will be conducted by UCDD staff and technical consultants. The information obtained from community outreach and the Phase I and II ESAs will be used to evaluate the potential level of effort necessary to clean up selected sites. Technical consultants will be hired to complete Analysis of Brownfield Cleanup Alternatives (ABCAs) at a cost of approximately \$4,000 per site, with an estimated 5 (4 Hazardous Substance/1 Petroleum) sites. This will be leveraged with other funds to conduct visioning for brownfield redevelopment. The UCDD will contribute as In-kind any programmatic expenses necessary for subtasks such as mapping, copying, publishing, mailing, etc., as well staff time for attendance at meetings with TDEC staff or other stakeholders related to proposed cleanup and redevelopment. **Outputs** include cleanup and redevelopment plans and ABCAs. **Outcomes** include jobs and funding leveraged as part of future cleanup and reuse and acres made ready for reuse.

Assessment Grant Project progress will be updated on a quarterly basis as required and projects outcomes enumerated, added, and tracked into the ACRES database.

ii. Budget Table

The following table details anticipated costs applicable to both hazardous substance and petroleum budgets (allotment of \$193,000 toward hazardous and \$84,000 toward petroleum, for a **Total Project Budget of \$277,000**):

Hazardous Substance Sites Budget					
	Project Tasks				
Budget Categories	Brownfields Inventory & Outreach	Phase I ESAs	Phase II ESAs	Cleanup & Redevelopment Planning	Total
Personnel	In-Kind	-	-	In-Kind	\$0
Fringe Benefits	-	-	-	-	\$0
Travel	\$6,000	-	-	-	\$6,000
Equipment	-	-	-	-	\$0
Supplies	In-Kind	-	-	In-Kind	\$0
Contractual	\$1,000	\$30,000	\$140,000	\$16,000	\$187,000
Other	-	-	-	-	\$0
Total	\$7,000	\$30,000	\$140,000	\$16,000	\$193,000
Petroleum Substance Sites Budget					
	Project Tasks				
Budget Categories	Brownfields Inventory & Outreach	Phase I ESAs	Phase II ESAs	Cleanup & Redevelopment Planning	Total
Personnel	In-Kind	-	-	In-Kind	\$0
Fringe Benefits	-	-	-	-	0
Travel	\$4,000	-	-	-	\$4,000
Equipment	-	-	-	-	-
Supplies	In-Kind	-	-	In-Kind	-
Contractual	\$1,000	\$15,000	\$60,000	\$4,000	\$80,000
Other	-	-	-	-	-
Total	\$5,000	\$15,000	\$60,000	\$4,000	\$84,000

c. Ability to Leverage

The main leveraging tool the UCDD will use with ongoing brownfield redevelopment is a Revolving Loan Fund (RLF), which is operated through the Cumberland Area Investment Corporation (CAIC), a UCDD subsidiary, for the purpose of administering small loans to businesses that are working to create and/or retain jobs.

Each county in the region allots nearly all Community Development Block Grants (CDBG) awarded to public infrastructure improvement and upgrades, which can bolster brownfield redevelopment projects.

The redevelopment of the former Phillips Luminaries building in White County to the Jackson Kayak production facility is a leveraging success story from the UCDD's 2013 EPA Brownfields Assessment grant. The project leveraged approximately \$6.5 million in private investment, creating 50 construction jobs, as well as 250 permanent jobs upon completion. Redevelopment of the former Heritage Ford Dealership in the city of Cookeville, which began with EPA Brownfields Assessment funding as part of a 2009 grant, resulted in the

redevelopment of this property into the current Cookeville Public Works office. This project leveraged over \$2 million in local funds.

The UCDD will continue to leverage available funding for brownfield assessment, and if substantial contamination is found and sites are eligible, the local municipality or the UCDD plans to apply for EPA Brownfields Cleanup funding and/or seek other grant opportunities, such as Appalachian Regional Commission (ARC), to fulfill brownfield cleanup efforts.

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community

i. Community Involvement Plan

The UCDD holds a formal quarterly meeting with both city and county mayors of the region, all of whom sit on the UCDD Board of Directors. In previous quarterly Board meetings and annual county strategy sessions held in the summer months, the UCDD informed each county of EPA Brownfields programs and requested input on potential sites and future redevelopment plans. UCDD Board meetings, strategy sessions, and ongoing communication with local governments will provide a platform for local officials to prioritize sites for redevelopment and share progress on brownfields activities.

Community residents will be engaged and feedback collected regarding brownfields priorities through the community organizations listed in section 3.c., as well as through open public meetings held in their communities. Website and social media outlets will also be used, where applicable. The UCDD and partner organizations will work to target low-income residents and residents who live near brownfield sites for this input. Public meetings will be held at times that accommodate community and commuter work schedules, and postings will be made in places frequented by the target audience.

ii. Communicating Progress

Communication and updates on Assessment Grant activities will be conducted through local newspaper articles, local community organizations listed in section 3.c., public hearings and website and social media (both UCDD and affected local communities), if applicable. Communities involved will address non-English speaking residents and develop methods to distribute information in places frequented by affected residents (such as stores, churches, etc.).

b. Partnerships with Government Agencies

i. Local/State/Tribal Environmental Authority

The UCDD has established a healthy relationship with the Tennessee Department of Environment and Conservation (TDEC) to ensure appropriate assessment, cleanup, and redevelopment of brownfield sites. The UCDD maintains ongoing communication with Paula Larson Middlebrooks, Environmental Consultant and TDEC's brownfields coordinator. This partnership with both the state and local TDEC offices is important for ongoing guidance, technical support, and interpretation of rules regarding brownfields assessment and eventual cleanup activities. TDEC staff will provide technical oversight on the Site Specific Quality Assurance Project Plans, as well as technical assistance throughout the project.

ii. Other Governmental Partnerships

The UCDD maintains strong ongoing relationships with the Appalachian Regional Commission (ARC), Tennessee Department of Transportation (TDOT), the Tennessee Department of Economic & Community Development (TNECD), and county and city government officials in each of our region's fourteen counties. ARC is a federal-state partnership that works for sustainable community and economic development in the thirteen states that span the Appalachia region of the eastern United States. Covering many rural and disconnected areas, ARC aids in providing funding for a variety of projects to help build the capacity of the communities within this region and help Appalachia achieve socioeconomic parity with the nation. ARC funds could be used in the future to bolster projects related to brownfields redevelopment in the Upper Cumberland, particularly those with a job creation component. The UCDD works closely with TNECD and the Select Tennessee industrial site certification program and the Property Evaluation Program (PEP) to help rural communities like the counties in the Upper Cumberland certify and market potential industrial sites. Brownfield Environmental Site Assessments (ESA) of former industrial sites could work in conjunction with these programs to prepare industrial sites to be competitive for business recruitment and future job creation. The UCDD is also part of the US Economic Development Administration (EDA)'s Investing in Manufacturing Communities Partnership (IMCP) Tennessee Valley region, led by the University of Tennessee. This program was created to accelerate the resurgence of manufacturing in regions across the country and could be beneficial regarding brownfield site redevelopment into automotive manufacturing plants.

c. Partnerships with Community Organizations

i. Community Organization Description & Role

Jackson: Jackson County Chamber of Commerce exists to maximize positive economic impacts of business activities in the county. For the EPA grant project, the Chamber commits to post and distribute brownfield assessment information through its communication network and provide other assistance that may be needed. **Overton:** Livingston Housing Authority provides public housing assistance to low-income families, seniors, and disabled individuals in Livingston, TN, in Overton County. This agency offers support of the project and is willing to assist in any capacity. Tennessee College of Applied Technology in Livingston offers its support and willingness to help in any capacity with this project. **Van Buren:** Spencer-Van Buren County Chamber of Commerce commits to assisting in the process of education and community involvement of local residents regarding this brownfield project. **White:** Sparta Housing Authority offers affordable public housing, housing projects, and subsidized housing all over Sparta, TN, in White County. Their goals include providing affordable housing in secure environments, while providing a high level of service. For this project, the Sparta Housing Authority will engage and collect feedback from public housing residents living near the former Agee Oil brownfield site about this project and future site redevelopment. Sparta-White County Chamber of Commerce wishes to be involved in the process of redeveloping the former Agee Oil site and incorporating this property into the ongoing Sparta Trails Plan.

ii. Letters of Commitment

Letters of commitment have been provided as an attachment to this proposal by the above-referenced organizations.

d. Partnerships with Workforce Development Programs

Addressing workforce development and education is the #1 goal of the UCDD's Comprehensive Economic Development Strategy (CEDS). Although there are no Brownfields job training grantees in the UCDD area, UCDD strives to connect residents with resources needed to compete for skilled jobs. The UCDD has strong partnerships with Tennessee Tech University and Motlow State Community College, which serve the entire district. UCDD will continue to work with these institutions and others to connect regional residents with any employment opportunities related to brownfields redevelopment.

4. PROJECT BENEFITS

a. Welfare, Environmental, and Public Health Benefits

Future redevelopment of any brownfield site in the region could transform a blighted area into a productive community use, including the following: mixed-use development, better public and affordable housing, new green spaces, safer walkability, and more practical commercial or industrial space. This redevelopment will help promote positive community activity and encourage homeownership (in residential areas), job creation, and a more vibrant community atmosphere, which will have an impact well beyond the boundaries of the brownfield property. In turn, a change in these neighborhoods is expected to decrease current crime and unemployment rates, raise per capita income levels, lower the poverty rate, reduce potential threats to human health and environment, and improve each city or county's tax base. Overall, this project will greatly improve the quality of life of Upper Cumberland residents, as well as decidedly improve the visual appeal of each community.

In particular in the target sites identified, which have significant elderly populations, potential carcinogens would be cleaned up and removed from nearby residents' neighborhoods, potentially reducing cancer risks and rates in these areas. Residents and workers around the Livingston Sawmill site would cease to be exposed to airborne sawdust and other chemicals used in treated wood, which are known to cause various respiratory problems, as well as other health issues. Residents around the Agee Oil site, many of whom are low-income public housing occupants, would cease to be potentially exposed to petroleum through groundwater and runoff into their property, as they gain a new greenspace in their neighborhood.

b. Economic and Community Benefits

The assessment and eventual cleanup of brownfield sites in the Upper Cumberland region will in some cases lead to more green space and the aesthetic improvement of small towns and access to walking trails, increasing the livability and connectivity of neighborhoods. In other cases, brownfield redevelopment will spur commercial and industrial recruitment, with numerous economic benefits to rural counties. In all cases, revitalization of brownfields in the Upper Cumberland will eliminate eyesores and blighted areas, putting less-than-desirable properties back into productive use.

Jackson County could redevelop the former Eaton plants into new industry, working to create and keep jobs in this struggling county. With Jackson County's elevated poverty and unemployment rates (24.1% and 7.4%, respectively), industrial recruitment to the area would be a welcome and beneficial use of the former Eaton plants. With rolling topography, limited infrastructure, and some land being located in a flood plain, the county has no other available land or facilities to market to prospective industries. This strategy coincides with the region's

Comprehensive Economic Development Strategy (CEDS) goal of Resiliency by working to create a diverse industrial base in the region. Livingston, located in Overton County, could begin the process of cleaning up their downtown former sawmill, turning it into a much-needed county services building in a prime location. Sparta, located in White County, could gain a greenway trailhead in a low- and middle-income residential area, eliminating an eyesore and connecting a riverside walking trail to the city's historic downtown. In addition, with the cleanup of a former manufacturing plant, the city could put a prime industrial location—one of the few in the region with rail access—back to use.

Spencer, located in distressed Van Buren County, stands to gain a public park in its town center, eliminating a blighted site located on the town's main thoroughfare. As Fall Creek Falls, Tennessee's largest and most-visited state park, is located in Van Buren County, driving park visitors into Spencer's downtown would be a prime way to increase tourism expenditures in this county. Increasing tourism revenue throughout the region is another goal detailed in the CEDS document. Improving Spencer's downtown appeal through adding public greenspace will be a great step toward this small town's revitalization. Other blighted sites and former service stations in this distressed county could be redeveloped into commercial space or other revenue producing activities for the city and county.

Redevelopment of the former Agee Oil site in Sparta (White County) into the Sparta Trails system will serve as a catalyst for more visits to the city's core, bringing visitors from the county and surrounding areas. This project would be beneficial to the city's redevelopment efforts and the lifestyle and well-being of Sparta/White County citizens.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Audit Findings: The UCDD has not had any adverse audit findings or problems with the administration of any grants.

b. Programmatic Capability

The Upper Cumberland Development District is comprised of over sixty staff members who work on a variety of projects funded by local, state and federal programs. As a State Planning District, the UCDD administers grants of this scope on a routine basis. Ms. Allison Fox, Community Development Planner and lifelong Upper Cumberland resident, will manage this UCDD Brownfields Assessment project. Ms. Fox has nearly five years of experience in the areas of research, grant project development, and grant administration. In the unlikely circumstance that Ms. Fox is unavailable to administer the grant, an internal staff search will be conducted to identify the most experienced staff member to continue administration. To ensure comprehensive brownfield education in the agency, two UCDD staff members will attend national and regional brownfields conferences as part of this grant project.

Through management of previous Brownfields grants, the UCDD has developed relationships with knowledgeable environmental consulting firms. As required, UCDD will qualify consulting firms through a bid process; consulting firms will be required to submit documentation that demonstrates their qualifications and experience to conduct Brownfields Inventory, Community Outreach, and Phase I and Phase II Environmental Site Assessments, as well as develop Quality Assurance Project Plans, Cleanup and Corrective Action Plans and work with state regulators regarding solid waste and brownfield assessment and remediation.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes

The UCDD has had significant success in utilizing the EPA Brownfields programs and has successfully tracked outcomes and outputs on all previously awarded grants to maintain a successful ongoing system. If awarded, the UCDD will continue to utilize this system, which heavily relies on accurate input of information into the ACRES database. This will allow the UCDD to quantify benefits from the assessment activities as measured by the number and type of assessments completed, type and location of contamination, acres of land cleaned up, jobs created, private investment leveraged, etc. Quarterly Reports will be completed to monitor progress during the duration of the grant.

d. Past Performance and Accomplishments

1. Accomplishments

--2013 EPA Brownfields Assessment Grant-\$400,000. With EPA funds, the UCDD completed seven Phase I ESAs, six Phase II ESAs, two Analyses of Brownfield Cleanup Alternatives (ABCA), and planning for Engineering Control at the former Phillips Luminaries building in Sparta, which has been redeveloped into the Jackson Kayak factory, an outdoor recreation company. Jackson Kayak is the greatest success story of the UCDD's 2013 Assessment grant. The former Phillips Luminaries building sat vacant for years and was set to be sold for scrap metal. Jackson Kayak needed to expand and chose to do so in that former manufacturing building because the UCDD was able to complete an updated Phase I ESA, followed by a Phase II ESA. Jackson Kayak purchased the former manufacturing facility to expand its operation, both saving the building and creating jobs for White County. The Vapor Intrusion identified during the Phase II ESA is now being managed in the building through an active system. This Assessment Grant project leveraged approximately \$6.5 million in private investment and created 425 jobs. --2009 EPA Brownfields Assessment Grant-\$400,000. With EPA funds, the UCDD completed fourteen Phase I ESAs, six Phase II ESAs, and two ABCAs. These activities created twenty jobs, led to the cleanup of approximately 400 acres of land, and leveraged \$3,109,000 in private investment. These outputs and outcomes are accurately reflected in ACRES. The most notable accomplishment of this grant was the assessment of Cookeville's former Heritage Ford Dealership, which has since been remediated and redeveloped into the city of Cookeville Public Works office.

2. Compliance with Grant Requirements

--2013 EPA Brownfields Assessment Grant-\$400,000. The UCDD completed all reporting for this grant in a timely manner, and the ACRES system has been kept up to date with project outputs and outcomes. This grant will be closed out in late December 2016; all funds will be expended at the time of closure. --2009 EPA Brownfields Assessment Grant-\$400,000. The UCDD completed all reporting for this grant in a timely manner, and all project outputs and outcomes were entered into the ACRES system. This grant was closed out on July 31, 2012; all funds were expended at the time of closure.

The UCDD and the counties we serve do not have funds in our budgets to perform environmental assessments of brownfields. Additional EPA funding will place the UCDD and our communities in a position to begin the process of remediation of brownfields and use our proven ability to leverage other sources to redevelop brownfields and put them back into productive use.

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

12/15/2016

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

Upper Cumberland Development District

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

62-0801436

*** c. Organizational DUNS:**

0607390750000

d. Address:

*** Street1:**

1225 S. Willow Ave.

Street2:

*** City:**

Cookeville

County/Parish:

*** State:**

TN: Tennessee

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

38506-4158

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

*** First Name:**

Allison

Middle Name:

*** Last Name:**

Fox

Suffix:

Title:

Organizational Affiliation:

*** Telephone Number:**

931-476-4106

Fax Number:

*** Email:**

afox@ucdd.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

D: Special District Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-16-08

* Title:

FY17 Guidelines for Brownfields Assessment Grants

13. Competition Identification Number:

NONE

Title:

None

14. Areas Affected by Project (Cities, Counties, States, etc.):

1235-Areas Affected By Project.pdf

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Upper Cumberland Region-Wide EPA Brownfields Assessment

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

[Add Attachment](#)[Delete Attachment](#)[View Attachment](#)**17. Proposed Project:*** a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="277,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="277,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

[Add Attachment](#)[Delete Attachment](#)[View Attachment](#)

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed:

